

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 22-CR-20114-KMW**

UNITED STATES OF AMERICA

vs.

CARLOS RAMON POLIT FAGGIONI

Defendant.

**UNITED STATES' NOTICE OF INTENT UNDER FRE 902(13) AND 902(14) TO OFFER
CERTIFIED RECORDS GENERATED BY AN ELECTRONIC PROCESS OR SYSTEM
AND CERTIFIED DATA COPIED FROM AN ELECTRONIC DEVICE, STORAGE
MEDIUM, OR FILE INTO EVIDENCE**

The United States of America, by and through undersigned counsel, respectfully provides notice that it intends, pursuant to Federal Rules of Evidence 902(13) and 902(14), to offer into evidence the certified records generated by an electronic process or system and certified data copied from an electronic device, storage medium, or file. The government seeks to introduce a selection of documents (identified in the certifications and listed below) from the Drousys System. The Drousys System was an off-book communications system utilized by Odebrecht S.A.'s Division of Structured Operations. The government obtained a forensic copy of the Drousys System from Odebrecht S.A. Odebrecht S.A. hired Forensic Risk Alliance ("FRA"), a global market leader in regulatory compliance obligations, litigation, and multi-jurisdictional investigations, through counsel, to forensically copy the Drousys System and ultimately provide forensic copies of the Drousys System to the government. The two attached certifications describe the manner in which the Drousys System was forensically copied by FRA and transmitted to the government. The certifications further attest that the exhibits listed in the certifications

come from that forensic copy. Additionally, witnesses who are the senders and recipients of the documents in question, will testify regarding the documents in question.

Counsel for the government has conferred with counsel for the defendant and the defendant will not stipulate to the authenticity of these documents. In an effort to move the trial forward efficiently and limit the number of witnesses called to testify on purely foundational issues, the government hereby files this notice and requests the Court take notice of the authenticity of the documents identified in the certifications (and listed below).

GX 3-1	DROUSYS_0000284879
GX 3-1A	DROUSYS_0000284886
GX 3-2	DROUSYS_0000223313
GX 3-2A	DROUSYS_0000223317
GX 3-3	DROUSYS_0000223279
GX 3-3A	DROUSYS_0000223280
GX 3-4	DROUSYS_0000223919
GX 3-4A	DROUSYS_0000223920
GX 3-5	DROUSYS_0003937039
GX 3-5A	DROUSYS_0003937042
GX 3-6	DROUSYS_0000224157
GX 3-6A	DROUSYS_0000224158
GX 3-8	DROUSYS_0004590621

The United States respectfully requests leave to submit additional notifications.

Respectfully submitted,

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